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**VIA ECF**

April 7, 2022

Hon. George B. Daniels  
United States District Judge  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

**Re: *Sokolow v. PLO*, No. 04-cv-00397 (GBD-RLE)**

Dear Judge Daniels:

We are counsel to Defendants Palestine Liberation Organization and the Palestinian Authority (“Defendants”) in this matter. We write to provide an update on the status of Plaintiffs’ motion to stay proceedings in the Second Circuit, and their related request for this Court to hold their motion for reconsideration “in abeyance” pending resolution of that motion. *See* Pls. 3/25/22 Letter, ECF 1060, at 1.

Attached is Defendants’ opposition to Plaintiffs’ motion for a stay, which was filed in the Second Circuit on April 4, 2022. As Defendants argue in their opposition, this Court’s Memorandum Decision fully satisfied the Second Circuit’s limited *Jacobson* remand, which asked this Court to examine the applicability and constitutionality of the PSJVTA. The issuance of the Memorandum Decision thus automatically restored jurisdiction to the Second Circuit. Moreover, Plaintiffs’ motion fails to provide any reason to stay the appeal, because this Court has already considered and rejected the arguments presented in the reconsideration motion. Plaintiffs’ motion does not offer any new evidence or change in controlling authority that would warrant “reconsideration” of this Court’s prior order.

Plaintiffs’ motion to stay remains pending in the Second Circuit, and Plaintiffs have specifically asked this Court to hold their reconsideration motion “in abeyance pending a ruling from the Second Circuit on the [stay] motion.” Pls. 3/25/22 Letter, ECF 1060, at 1. Accordingly, Defendants understand that the deadline for responding to the reconsideration motion is adjourned, pending further order of the Court. Defendants also note, as they did in their prior letter, that

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Plaintiffs' motion for reconsideration is improper both because it was filed after the Second Circuit recalled the mandate in this case, and because it fails to comply with Local Civil Rule 6.3. *See* Defs. 3/25/22 Letter, ECF 1058, at 1-2 & n.2.

Respectfully submitted,

Squire Patton Boggs (US) LLP



Gassan A. Baloul

cc: All Counsel (via ECF)